

1 Alex L. Fugazzi, Esq.
2 Nevada Bar No. 9022
3 Wayne Klomp, Esq.
4 Nevada Bar No. 10109
5 SNELL & WILMER L.L.P.
6 50 West Liberty Street, Suite 510
7 Reno, Nevada 89501
8 Telephone: 775-785-5440
9 Facsimile: 775-785-5441
10 Email: afugazzi@swlaw.com
11 wklomp@swlaw.com

12
13 *Attorneys for Plaintiffs US Bank National
14 Association and Wells Fargo*

15 **UNITED STATES DISTRICT COURT**
16
17 **DISTRICT OF NEVADA**

18 US BANK NATIONAL ASSOCIATION, AS
19 TRUSTEE, SUCCESSOR IN INTEREST TO
20 WACHOVIA BANK, NATIONAL
21 ASSOCIATION AS TRUSTEE FOR WELLS
22 FARGO ASSET SECURITIES
23 CORPORATION, MORTGAGE PASS-
24 THROUGH CERTIFICATES, SERIES 2005-
AR2 AT 4801 FREDERICA STREET,
OWENSBORO, KY 42301, a national
association; WELLS FARGO BANK, N.A., a
national association;

25 Plaintiffs,

26 vs.

27 VILLA VECCHIO CT. TRUST, a Nevada
28 trust; ABSOLUTE COLLECTION
SERVICES, LLC, a Nevada limited-liability
company; THE FOOTHILLS AT SOUTHERN
HIGHLANDS HOMEOWNERS
ASSOCIATION, a Nevada non-profit
corporation;

29 Defendants.

30 Case No. 2:17-cv-00143-MMD-VCF

31
32 **STIPULATION AND ORDER
33 EXTENDING TIME FOR PLAINTIFFS
34 TO RESPOND TO VILLA VECCHIO
35 CT. TRUST'S RENEWED MOTION TO
36 DISMISS COMPLAINT**

37 **(FIRST REQUEST)**

38 Plaintiffs US Bank National Association, as Trustee, Successor in Interest to Wachovia
39 Bank, National Association as Trustee for Wells Fargo Asset Securities Corporation, Mortgage
40 Pass-Through Certificates, Series 2005-AR2 at 4801 Frederica Street, Owensboro, KY 42301

1 ("US Bank") and Wells Fargo Bank, N.A. ("Wells Fargo" and together with US Bank,
2 "Plaintiffs"), and Defendant Villa Vecchio Ct. Trust ("Villa Vecchio" and together with Plaintiffs
3 and Villa Vecchio, the "Parties"), through their counsel hereby respectfully request the Court
4 enter an order, pursuant to Local Rules IA 6-1 and 7-1, extending the time for Plaintiffs to
5 respond to Villa Vecchio's Renewed Motion to Dismiss Complaint (ECF No. 53) otherwise due
6 on June 19, 2019. The Parties request that the time be extended to July 10, 2019.

7 The Parties are currently considering stipulations to limit the issues in the Renewed
8 Motion to Dismiss or to brief the issues in summary judgment, which motions are due July 31,
9 2019. The outcome of those considerations will very likely conserve judicial and party resources.
10 Additionally, Villa Vecchio has recently retained its undersigned counsel who needs additional
11 time to consider the stipulations. Therefore, the stipulation and extension are made by the Parties
12 in good faith for the benefit of each. The Stipulation is made for the benefit of the Parties and the
13 Court and not for any deleterious purpose nor to delay these proceedings.

14 DATED this 19th day of June, 2019.

15 ROGER P. CROTEAU & ASSOCIATES

16 By: /s/ Roger P. Croteau
17 Roger P. Croteau, Esq.
18 Nevada Bar No. 4958
19 Timothy E. Rhoda, Esq.
20 Nevada Bar No. 7878
21 9120 West Post Road, Suite 100
22 Las Vegas, Nevada 89148
23 *Attorneys for Villa Vecchio Ct. Trust*

DATED this 19th day of June, 2019.

SNELL & WILMER L.L.P.

By: /s/ Wayne Klomp
1 Alex L. Fugazzi, Esq.
2 Nevada Bar No. 9022
3 Wayne Klomp, Esq.
4 Nevada Bar No. 10109
5 50 West Liberty Street, Suite 510
6 Reno, Nevada 89501
7 *Attorneys for US Bank and Wells Fargo*

24 IT IS SO ORDERED.



26 UNITED STATES DISTRICT JUDGE

27 DATED: June 21, 2019

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing on all parties appearing herein by the method indicated:

U.S. Mail

U.S. Certified Mail

Electronic Mail (E-mail)

Overnight Mail

Federal Express

Hand Delivery

X Electronic Filing

DATED: June 19, 2019.

/s/ Lara J. Taylor

An Employee of Snell & Wilmer L.L.P.